

EXHIBIT 1

FILED
04-12-2021
CIRCUIT COURT
DANE COUNTY, WI
2021CV000848
Honorable Stephen E
Ehlke
Branch 15

STATE OF WISCONSIN CIRCUIT COURT DANE COUNTY

LAKESHA BOZEMAN,
1009 Winding Way,
Middleton, WI 53562,

Case No.: 2021CV00____
Case Code 30106

Plaintiff,

SUMMONS

vs.

ELITE MEDIA, LLC,
92 Morningside Avenue,
New York, NY 10027,

and

CHRISTOPHER CRAWFORD,
92 Morningside Avenue,
New York, NY 10027,

Defendants.

THE STATE OF WISCONSIN, To each person named above as a
Defendant:

You are hereby notified that the Plaintiff named above has filed a lawsuit
or other legal action against you. The complaint, which is attached, states the
nature and basis of the legal action.

Within 45 days of receiving this summons, you must respond with a written
answer, as that term is used in chapter 802 of the Wisconsin Statutes, to the
complaint. The court may reject or disregard an answer that does not follow the
requirements of the statutes. The answer must be sent or delivered to the court,
whose address is 215 South Hamilton Street, Madison, Wisconsin 53703, and to
Attorney William F. Sulton, Plaintiff's attorney, whose address is GINGRAS

THOMSEN & WACHS LLP, 219 North Milwaukee Street, Suite 520, Milwaukee, Wisconsin 53202. You may have an attorney help or represent you.

If you do not provide a proper answer within 45 days, the court may grant judgment against you for the award of money or other legal action requested in the complaint, and you may lose your right to object to anything that is or may be incorrect in the complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property.

Dated at the law office of GINGRAS THOMSEN & WACHS LLP in Milwaukee, Wisconsin, on this 12th day of April, 2021.

*Electronically signed by
Attorney William F. Sulton*

WILLIAM F. SULTON
State Bar No. 1070600

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COMPLAINT

vs.

ELITE MEDIA, LLC,
92 Morningside Avenue,
New York, NY 10027,

and

CHRISTOPHER CRAWFORD,
92 Morningside Avenue,
New York, NY 10027,

Defendants.

NOW COMES Plaintiff Lakesha Bozeman, by her attorneys, the law firm of GINGRAS THOMSEN & WACHS LLP, by Attorney William F. Sulton, and files this complaint against Defendants Elite Media, LLC, and its owner and operator, Christopher Crawford.

I. Introduction

1. Plaintiff Lakesha Bozeman was an executive on the rise with a large Wisconsin company. Defendants Christopher Crawford and his marketing company, Elite Media, LLC, began a smear campaign as a reprisal for Ms. Bozeman's attempts to address Defendants' poor performance, fabricated invoices, and missed deadlines. As a result of Defendants' defamatory statements expressing and implying that Ms. Bozeman sought kickbacks, she was forced to resign her job. This lawsuit seeks legal redress for Defendants' unlawful conduct.

II. The Parties

A. The Plaintiff

2. Plaintiff Lakesha Bozeman ("Ms. Bozeman") resides and is domiciled in Dane County, Wisconsin.

B. The Defendants

3. Defendant Elite Media, LLC ("Elite Media") is a New York company owned and operated by Defendant Christopher Crawford. Elite Media's principal office is located at 92 Morningside Avenue, New York, New York 10027.¹

4. Defendant Christopher Crawford ("Mr. Crawford") owns and operates Elite Media. Mr. Crawford has represented himself as the "President" and "Chief Creative Officer" of Elite Media. He works out of Elite Media's principal office located at 92 Morningside Avenue, New York, New York 10027.

III. Jurisdiction and Venue

5. This Court has jurisdiction over Ms. Bozeman's claims and the Parties pursuant to Wis. Stat. §§ 801.04(1) and (2) and §§ 801.05(1)(d) and (3).

6. Venue in this Court is proper pursuant to Wis. Stat. §§ 801.50(2)(a) and (c).

IV. The Facts

7. Ms. Bozeman worked for American Family Mutual Insurance Company, S.I. ("American Family") from April 2, 2018 to January 5, 2021.

¹ Contact Elite Media, ELITE MEDIA LLC, <https://elitemediawill.com/contact/> (last visited Apr. 9, 2021).

8. American Family is a Wisconsin company with its principal office located at 6000 American Parkway, Madison, WI 53783.

9. On April 2, 2018, American Family hired Ms. Bozeman as its Enterprise Brand Strategy Director.

10. American Family's 2018 Annual Performance Review of Ms. Bozeman rated her work as "outstanding."

11. American Family subsequently promoted Ms. Bozeman to Enterprise Integrated Marketing Director.

12. American Family's 2019 Annual Performance Review of Ms. Bozeman rated her work as "outstanding."

13. American Family subsequently promoted Ms. Bozeman to Enterprise Brand Strategy Assistant Vice President.

14. Elite Media is a marketing company that holds itself out as "[a]n elite group of best-in-class creative and marketing specialists" that "leverage[s] the influence of celebrity and cultural movements to create win-win partnerships between brands, content creators, and talent."²

15. Elite Media's website states that it offers "services" including "branded content," "event production," "platform development," "strategy," "digital & print creative," and "cultural content."

16. American Family is Elite Media's client.

² Profile of Elite Media, ELITE MEDIA LLC, <https://elitemediawill.com/profile/> (last visited Apr. 9, 2021).

17. Mr. Crawford and Elite Media's agents, employees, and representatives frequently communicated with Ms. Bozeman and other American Family employees in Dane County.

18. In 2020, Elite Media regularly missed deadlines and failed to meet deliverables.

19. When Ms. Bozeman's subordinates complained about Elite Media's failures, poor performance, and fabricated invoices, Mr. Crawford claimed race discrimination. (Mr. Crawford is African-American.)

20. By October 2020, Elite Media's performance had been so bad for so long that Ms. Bozeman's subordinates elevated their concerns about Elite Media to superiors at American Family.

21. In November 2020, Ms. Bozeman attempted to address Elite Media's failures by having conversations with Mr. Crawford.

22. Mr. Crawford retaliated against Ms. Bozeman by falsely accusing her of requesting gifts and kickbacks.

23. In or about December 2020, Mr. Crawford created a "deck" for the object and purpose of smearing Ms. Bozeman's reputation with her superiors at American Family.

24. The "deck" contained falsehoods and misrepresentations.

25. Mr. Crawford alleged that Ms. Bozeman made "increasingly inappropriate" requests of Elite Media.

PURPOSE

The purpose of this deck is to provide additional context around the recent developments between Elite and Ms. Bozeman.

We always look to serve the brand. As such, we were initially willing to carry out Ms. Bozeman's requests. As you can see from the pages that follow, these requests started out somewhat innocuous, if a little out of the ordinary. However, over the course of a few months, the requests became increasingly inappropriate, and our recourse for adjusting behavior without escalating it to Leadership became increasingly limited. I saw reaching out as our last resort, and our goal is simply to work with the appropriate parties to determine a solution and the best path forward. We just want to be able to continue to create great work on behalf of the brand.

26. The above statements are false and defamatory because they imply that Ms. Bozeman sought kickbacks.

27. Mr. Crawford alleged that Ms. Bozeman requested that Elite "rewrite the bio she would have to recite to introduce herself to Senior Leadership after she received a promotion."

Results Week Intro

Ms. Bozeman requested that Elite rewrite the bio she would have to recite to introduce herself to Senior Leadership after she received a promotion. According to Ms. Bozeman, her Intro was well-received.

28. The above statement is false and defamatory because it implies that Ms. Bozeman sought a kickback.

29. Ms. Bozeman mentioned to Mr. Crawford that she was writing an introduction and he offered to review it.

30. While Ms. Bozeman accepted Mr. Crawford's offer to review the introduction she wrote, he did not "rewrite" the introduction.

31. Mr. Crawford alleged that Ms. Bozeman requested that Elite Media "rewrite the Adage 40 Under 40 submission that she was supposed to create and submit to Leadership so they could nominate her."

40 Under 40

Also in early August, Ms. Bozeman requested that Elite rewrite the Adage 40 Under 40 submission that she was supposed to create and submit to Leadership so they could nominate her. Elite dedicated its president (myself), copywriter, and a comms professional to the task.

32. The above statement is false and defamatory because it implies that Ms. Bozeman sought a kickback.

33. While Mr. Crawford, along with agency partners of American Family, reviewed the 40 under 40 submission, none of the agency partners, including Mr. Crawford or his company, rewrote the submission.

34. Moreover, the 40 under 40 submission was less than 200 words.

35. Mr. Crawford alleged that Ms. Bozeman requested that Elite Media "complete a class project for Ms. Bozeman's daughter[.]"

In early October, Elite was asked to complete a class project for Ms. Bozeman's daughter, Ava. We were asked to take photos of the bunny Ava drew in different locations around the city. Our Assistant Account Executive completed this request on 10/7 and mailed the bunny back to Ms. Bozeman.

36. The above statements are false and defamatory because they imply that Ms. Bozeman sought a kickback.

37. Mr. Crawford mailed a pink polaroid camera with film to Ms. Bozeman's daughter as a gift.

38. Mr. Crawford called Ms. Bozeman's home and spoke with Ms. Bozeman's daughter: during which Ms. Bozeman's daughter asked Mr. Crawford to take photos of a cutout character in New York.

39. Mr. Crawford chose to take photos on his own accord.

40. Mr. Crawford alleged that Ms. Bozeman requested that Elite Media "retouch photos she had taken."

- On October 15th, Ms. Bozeman asked Elite to retouch photos she had taken. She requested that Elite "lift her boobs" (via phone) and generally make her look better. She followed up with an email (screenshots included) that corroborates the same (see: "lift chest"). What follows are before and after photos of Elite's work.

41. The above statements are false and defamatory because they imply that Ms. Bozeman sought a kickback.

42. During a Zoom call, Mr. Crawford commented on Ms. Bozeman's appearance.

43. Ms. Bozeman explained that she was getting pictures taken of her.

44. Mr. Crawford sent Ms. Bozeman a text message in which he offered to "photoshop" the photos.

45. Because Ms. Bozeman did not respond, Mr. Crawford called Ms. Bozeman and told her that he would "photoshop" the photos and described how he could smooth out and enhance the photos.

9:20



Chris

Lol

Wasn't ready

I was like where y'all going on zoom

HA HA

Stop!! We're taking care of business over here!

Did you get a solo for head shots?

I take head shot pictures tomorrow. I'm a bit nervous because the lady doesn't look like us. She is good and the only one I could find close to Madison.

We have photo shoot it's all good

Just bring her images that you want her to reference so u aren't relying completely on her taste level

*photoshop

Got it

Tue, Sep 29, 7:08 AM

GM Chris. Let me know if we are going meet for our 1:1

Message



46. Mr. Crawford falsely alleged that Ms. Bozeman "inquired about a job" at Elite Media and asked about a "kickback."

COMPENSATION REQUEST & INITIAL REFUSAL - 10/20

- On October 20th, a week after a meeting about brand ambassadors with her bosses which Ms. Bozeman described as "tough," Ms. Bozeman inquired about a job working with Elite. I told her that was not a good idea; we work really hard at Elite. She agreed that she heard I was hard to work for.
- Ms. Bozeman followed up by asking, "If you got more work, would I get a commission?"
- I replied, "no, that would be a kickback."
- After a nervous laugh, Ms. Bozeman advised that she interviewed a woman for a job in marketing at AmFam but said she might not be able to get her, because she was just about to get a promotion at Diageo.
- According to Ms. Bozeman, during the interview, the candidate would often serve stints for executives while they were on maternity leave. During her conversation she asked if Ms. Bozeman liked her multicultural agency. Ms. Bozeman replied that she loved her multicultural agency.
- Ms. Bozeman then offered to give the candidate my number. I advised that Elite does not handle promotions for alcohol or tobacco brands.

47. The above statements are false and defamatory because they imply that Ms. Bozeman sought a kickback.

48. Mr. Crawford alleged that Ms. Bozeman retaliated against Elite Media by directing a subordinate "to question Elite's expenses and services[.]"

ATTEMPTS AT COURSE CORRECTION - NOVEMBER 2020

- After the rebuffed request for compensation, the tenor of the relationship with Ms. Bozeman changed. I became concerned that Ms. Bozeman would seek retaliation.
- Ms. Bozeman's direct report began to question Elite's expenses and services which Ms. Bozeman had previously authorized. It seemed there was a lack of communication and process that could give the appearance that Elite was going rogue, providing services and expenses without authorization, and not serving the brand.
- I therefore began cc'ing Ms. Bozeman's supervisor, Sherina Smith, on communications in an effort to get Ms. Bozeman to follow a formal process for allocating work (for example, Ms. Bozeman questioned why Elite needed a brief to begin work via phone. I followed up with an email documenting that Elite would indeed need a brief to begin work and cc'd Ms. Smith). I had hoped that doing so would quell any attempt at retaliation without having to escalate the issue further.

49. The above statements are false and defamatory because they imply that Ms. Bozeman sought a kickback.

50. On January 5, 2021, Ms. Bozeman was forced to resign from American Family due to Defendants' knowingly false, misleading, and deceptive statements about Ms. Bozeman.

V. The Claims

51. Ms. Bozeman incorporates here all other paragraphs in this complaint.

52. Defendants' libelous statements about Ms. Bozeman were unlawful because they are knowingly false statements that express and imply that Ms. Bozeman sought kickbacks from Defendants.

53. Defendants' slanderous statements about Ms. Bozeman were unlawful because they are knowingly false statements that express and imply that Ms. Bozeman sought kickbacks from Defendants.

54. Defendants, unlawfully, and tortiously, interfered with Ms. Bozeman's employment at American Family by expressing and implying that Ms. Bozeman sought kickbacks from Defendants.

55. Defendants unlawfully, and intentionally, inflicted emotional distress by expressing and implying that Ms. Bozeman sought kickbacks from Defendants for the object and purpose of Ms. Bozeman losing her job at American Family.

56. Defendants caused Ms. Bozeman to experience emotional pain, suffering, inconvenience, mental anguish, and loss of enjoyment of life.

57. Defendants caused Ms. Bozeman to suffer lost wages and benefits, and future lost wages and benefits.

VII. Requested Relief

58. Ms. Bozeman respectfully requests that the Court enter judgment for her on each claim against Defendants, jointly and severally, and award the following relief:

- a. An order awarding damages for lost wages and benefits, future lost wages and benefits, and other compensatory and future pecuniary damages in an amount to be determined by a jury.
- b. An order awarding damages for emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, and other nonpecuniary losses in an amount to be determined by a jury.
- c. An order awarding punitive damages in an amount to be determined by a jury.
- d. An order awarding attorneys' fees, experts' fees, and other costs in an amount to be determined by the Court.
- e. An order for further necessary and proper relief as determined by the Court.

VIII. Jury Demand

59. Ms. Bozeman hereby demands a trial by jury of twelve persons on all issues of fact and damages stated herein.

Dated at the law office of GINGRAS THOMSEN & WACHS LLP in Milwaukee,
Wisconsin, on this 12th day of April, 2021.

*Electronically signed by
Attorney William F. Sulton*

WILLIAM F. SULTON
State Bar No. 1070600

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